

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Southern DIVISION

JOAQUIN SUAREZ

v.

NO. 7:22-cv-21-D

SOUTHERN CARLSON

COMPLAINT

Plaintiff resides at:

309 Foxwood Ln
WILMINGTON, NC 28409

Defendant(s)' name(s) and address(es), if known:

SOUTHERN CARLSON, INC.
10840 HARNEY STREET
OMAHA, NE 68154

LOCAL STORE WHERE I WORKED:

3240 US-421 SUITE A
WILMINGTON, NC 28401

Jurisdiction in this court is based on:

TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. THIS LAW MAKES IT ILLEGAL TO DISCRIMINATE AGAINST SOMEONE ON THE BASIS OF RACE, COLOR, AGE, RELIGION, SEX, NATIONAL ORIGIN.

The acts complained of in this suit concern:

RACE AND AGE DISCRIMINATION.

NON PAID WAGES FOR WORKING AN ADDED RESPONSABILITY OF MANAGING STORE SINCE MANAGER LEFT ON MID-SEPTEMBER 2019 THRU APRIL 24, 2020.
ALSO HARASSMENT AND ABUSES.

BRIEF DESCRIPTION: I AM HISPANIC WHILE WORKING FOR SOUTHERN CARLSON FROM DECEMBER 20, 2018 THRU APRIL 24, 2020. WE WERE 2 FULL TIME EMPLOYEES, MY MANAGER OSCAR ZENO AND I. IN MID SEPTEMBER 2019 MY MANAGER TOOK 2 WEEKS OFF AND THEN LEFT THE COMPANY. HIS MANAGER ZACH COOK INSTRUCTED HIM TO LEAVE ME IN CHARGE OF MANAGING AND RUNNING THE STORE BY MYSELF. I NEVER RECEIVED A PAY INCREASE OR

POSITION CHANGE/PROMOTION FOR ADDITIONAL

RESPONSABILITIES. I ASKED ALL HIGHER MANAGERS

(ZACK COOK, KEVIN TRIPPET, SEAN GEBHART AND ANDREI MILITARU)

FOR PAY INCREASE ACCORDING TO EXTRA POSITION RESPONSABILITIES,

POSITION CHANGE AND ALSO A HELPER AND THEY ONLY

PROMISED TO LOOK INTO IT BUT NOTHING HAPPENED. THEN

THEY LAID ME OFF AND HIRED 2 WHITE AMERICAN YOUNGER
GUYS TO REPLACE ME. PLEASE SEE COMPLAINT DOCUMENTS
TO EEOC WHICH WASN'T ABLE TO REACH A DECISION AND ASKED
TO FILE CLAIM WITH FEDERAL COURT.

ATTACHED EEOC DOCUMENTS (5 PARTS).

(If you need more space, or wish to include any further information for consideration, please attach additional sheets.)

I seek the following relief:

1) PAYMENT OF EXTRA SALARY FOR ADDED MANAGER

POSITION RESPONSABILITIES SINCE SEPTEMBER 2019 THRU APRIL 2020.

2) MAXIMUM MONETARY COMPENSATION ALLOWED BY

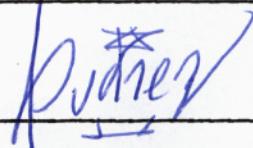
LAW FOR RACE AND AGE DISCRIMINATION, HARASSMENT AND
ABUSES PLUS SUFFERING AND ECONOMICAL HARDSHIP
CAUSED TO ME AND FAMILY.

3) HIGHEST PENALTY FOR DISCRIMINATION SO THEY STOP.

2/3/22

DATE

SIGNATURE OF PLAINTIFF



JOAQUIN SUAREZ
309 FOXWOOD LN
WILMINGTON, NC 28409
(910) 262-3485

ADDRESS AND PHONE NUMBER OF PLAINTIFF